

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UN Sealed
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prohibited by court order.

H-07-36

UNITED STATES OF AMERICA

VS.

CASE NO. H-07cr_____

1. JAIME LEAL GONZALEZ
(aka Jimmy)

2. ISIDRO LEAL GONZALEZ
(aka Chilo)

3. ENRIQUE GÜTIERREZ
(aka Primo)

4. LUIS COTTO
(aka Richard)
(aka Felix Hernandez)

5. JOSE GUADALUPE CONTRERAS
(aka Lupin)

6. ANGEL RODOLPHO GARZA

7. ALI ABDUL RASUL

UN-SEALED PER Order
dated 4/10/07

United States District Court
Southern District of Texas
FILED

FEB 07 2007

Michael N. Milby, Clerk

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Possess with the Intent to Distribute (Cocaine)

Beginning on or about 26 November 2005, and continuing up to and including the date of the return of the indictment, in the Southern District of Texas, and elsewhere,

**JAIME LEAL GONZALEZ (aka Jimmy),
ISIDRO LEAL GONZALEZ (aka Chilo),
ENRIQUE GUTIERREZ (aka Primo),
LUIS COTTO (aka Richard)(aka Felix Hernandez), and
JOSE GUADALUPE CONTRERAS (aka Lupin),**

defendants herein, did unlawfully, knowingly, and intentionally, combine, conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)(ii).

COUNT TWO

Possession with the Intent to Distribute (Cocaine)

On or about 15 February 2006, in Southern District of Texas,

ENRIQUE GUTIERREZ (aka Primo), and
JOSE GUADALUPE CONTRERAS (aka Lupin)

defendants herein, aiding, assisting, and abetting each other and others, known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with the intent to distribute a controlled substance. This violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(ii) and 18 U.S.C. § 2.

COUNT THREE

Conspiracy to Commit Money Laundering (Promotion)

Beginning on or about 26 November 2005, and continuing up to and including the date of the return of the indictment, in the Southern District of Texas, and elsewhere,

**JAIME LEAL GONZALEZ (aka Jimmy),
ISIDRO LEAL GONZALEZ (aka Chilo),
ANGEL RODOLPHO GARZA, and
ALI ABDUL RASUL**

defendants herein, did knowingly and intentionally agree, combine, conspire and confederate with each other, and others known and unknown to the Grand Jury, to commit the following offense against the United States:

To knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce and which involved the proceeds of specified unlawful activity, namely, the sale and distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. § 1956 (a)(1)(A)(i).

Manner and Means

1. It was a part of the conspiracy that one or more of the conspirators would request or direct one or more other members of the conspiracy to travel to locations to collect or acquire possession of United States Currency (USC), which represented narcotics proceeds, from individuals to whom narcotics shipments had previously been delivered on consignment.
2. It was further a part of the conspiracy that following the collection or acquisition of this USC one or more of the conspirators would request or direct one or more of the other members

of the conspiracy to transport the USC to other individuals for subsequent disposition and transfer.

3. It was further a part of the conspiracy that one or more members of the conspiracy would be paid money for transporting, transferring, and disposing of the USC to the care of others.

Overt Acts

In furtherance of and to accomplish the objects of the conspiracy alleged in Count One of this Information, the following overt acts, among others, were committed in the Southern District of Texas and elsewhere:

1. On or about 29 November 2005, in Houston, Texas, defendant Ali Abdul Rasul transferred approximately \$80,000.00 in USC to another for subsequent disposition and transfer.

2. On or about 29 November 2005, in Houston, Texas, defendant Angel Rodolpho Garza was transporting approximately \$717,515.00 in USC for subsequent disposition and transfer.

[All in violation of 18 U.S.C. § 1956(h)].

COUNT FOUR
Money Laundering (Promotion)

On or about 29 November 2005, in the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court,

ANGEL RODOLPHO GARZA, and
ALI ABDUL RASUL

defendants herein, aiding and abetting each other, and others known and unknown to the Grand Jury, did unlawfully and knowingly conduct or attempt to conduct a financial transaction affecting interstate and foreign commerce, that is, the transfer and subsequent disposition from one person to another of United States currency which represents the proceeds of a specified unlawful activity, namely, violations of 21 U.S.C. §§ 841 and 846, with the intent to promote the carrying on of said specified unlawful activity and that while conducting or attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is, funds totaling approximately \$717,515.00, in United States currency, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. § 1956(a)(1)(A)(i) and 2.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to 21 U.S.C. § 853 – as a result of the commission of a violation of 21 U.S.C. §§ 846, 841(a)(1), & 841(b)(1)(A)(ii) – and pursuant to 18 U.S.C. § 982 – as a result of the commission of a violation of 18 U.S.C. §§ 1956(a)(1)(A)(i) and 1956(h) – notice is given that the defendant(s):

**JAIME LEAL GONZALEZ (aka Jimmy),
ISIDRO LEAL GONZALEZ (aka Chilo),
ENRIQUE GUTIERREZ,
LUIS COTTO (aka Richard)(aka Felix Hernandez),
JOSE GUADALUPE CONTRERAS (aka Lupin),
ANGEL RODOLPHO GARZA, and
ALI ABDUL RASUL**

shall forfeit to the United States of America-

- (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of any such violation; and
- (2) any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violation.

Including, but not limited to:

- (1) approximately Seven Hundred Seventeen Thousand Five Hundred Fifteen and No/100 (\$717,515.00) in U.S. currency, seized on or about 29 November 2005;
- (2) real property, with improvements and appurtenances located at 1729 Priest, Houston, Texas and legally described as Lots Four Hundred Ninety-Four (494) and Four Hundred Ninety-Five (495), in Block Thirteen (13) of Archer's Subdivision of Wrights Acres Second Section, a subdivision in Harris County, Texas.

In the event that the property which is subject to forfeiture to the United States, as a result of any act or omission of the defendant:

- (1) cannot be located upon exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property, pursuant to 21 U.S.C. § 853 (p)(2) and 18 U.S.C. § 982(b)(1).

A TRUE BILL

Original Signature on File

~~FOREPERSON OF THE GRAND JURY~~

DONALD J. DeGABRIELLE, JR.
United States Attorney

By:



PETER MASON
Assistant United States Attorney
713.567.9357